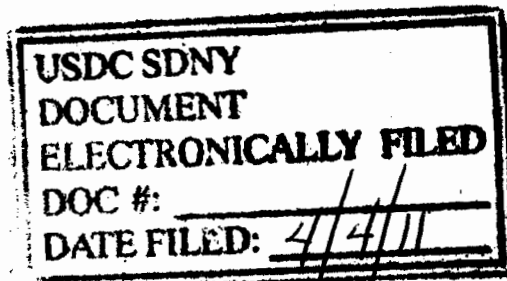


(e-Filed)



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JUDITH STRICKLAND, Derivatively On
Behalf of Nominal Defendant CHINA NORTH
EAST PETROLEUM HOLDINGS LIMITED,

Plaintiff,

v.

WANG HONGJUN, YU LIQUO, ROBERT C.
BRUCE, EDWARD M. RULE, LI JINGFU,
ZHANG YANG DIO, JU GUIZHI,

Defendants,

- and -

CHINA NORTH EAST PETROLEUM
HOLDINGS LIMITED,

Nominal Defendant.

10 Civ. 05445 (MGC)

STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME TO
RESPOND TO COMPLAINT

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned
counsel, that the time for defendant Robert C. Bruce to move, answer or otherwise respond to the
Verified Amended Shareholder Derivative Complaint in the above proceeding shall be extended
from April 4, 2011 to and including April 20, 2011.

Dated: New York, New York
March 31, 2011

DEBEVOISE & PLIMPTON LLP

By: Edwin G. Schallert
Edwin G. Schallert
egschallert@debevoise.com
919 Third Avenue
New York, New York 10022
(212) 909-6000

Attorneys for Defendant Robert C. Bruce

RIGRODSKY & LONG, P.A.

By, 

Timothy D. McFall

tim@rigrotskylong.com

585 Stewart Avenue, Suite 304
Garden City, New York 11530
(516) 683-3516

Lead Counsel for Plaintiffs

5 | SO ORDERED:

U.S.D.J.